

# Docket # 15-BSTD-01

California Energy Commission

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2016 Building Standards Update, and hopefully also 2013 improvement

**Why Does The CEC think 15-Day Language Is Better Than Before July 1, 2014?**

November 9, 2015

Greetings

Although the 15-day language is much better than current 2013 and 2016 Title 24, please explain your rationale why you think the 15-day language will save more energy than how lighting retrofits were generally done before July 1, 2014?

Please explain, because I cannot think of any good reason for that.

With the very common diminishing returns, because there is so little low hanging fruit left, any extra cost and mandates from Title 24 kill many lighting retrofit projects.

With so many LED and even legacy products having such low wattage and many people doing a great job manually turning lights off in many 'owned spaces' occupancy sensors are often not cost effective, not just with fewer than three fixtures, but they are often not cost effective with many more fixtures.

Why doesn't the CEC allow sufficient light and wattage for the nonvisual or biologic part of the visual system?

Why does the CEC think it is better than the free market saving energy in lighting retrofits?

Californians and others deserve answers from the CEC.

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